

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**  
**Plaintiff,**

**vs.**

**No. CR 03-1224 MCA**

**TIFFANY ROBINSON,**  
**Defendant.**

**MOTION TO AMEND CONDITIONS OF RELEASE**

The Defendant, Tiffany Robinson, by and through counsel moves this Court to amend Defendant's conditions of release as follows:

1. The Order Specifying Methods & Conditions of Release was filed in this case on June 5, 2003.
2. Said Order specifies that Defendant Robinson is not to leave the state of New Mexico without the permission of the Court.
3. Defendant Tiffany Robinson and her family have planned a family outing to a cabin in the Mancos, Colorado area. Defendant has planed to leave for the cabin near Mancos Colorado at 7:00 a.m., on Saturday, August 30, 2003 and return to her home in Farmington, New Mexico by 7:00 p.m., on Sunday, August 31, 2003.
4. Pretrial Services Representative Aaron Givens does not oppose this motion.
5. Opposing counsel, AUSA James Braun, does not oppose this motion.

Wherefore, based on the foregoing, Defendant Tiffany Robinson respectfully requests that her conditions of release be amended to permit her to travel with her family to a cabin in the Mancos, Colorado area departing at 7:00 a.m. on Saturday, August 30, 2003 and returning to her home in Farmington, New Mexico no later than 7:00 p.m., on Sunday, August 31, 2003.

Respectfully submitted,

By:

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Joe M. Romero, Jr.  
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I certify that a true copy of the foregoing  
was mailed to opposing counsel and Pretrial  
Services Officer Aaron Givens this 26<sup>th</sup> day of  
August, 2003.

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Joe M. Romero, Jr.